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AUG 10

June 26, 1990

Mary T. Smith
Director, Field Operations and Support Division (EN-397F)
U. S. Environmental Protection Agency
401 M Street SW
Washington, D. C. 20460

Dear Ms Smith

Docket A-90-16 (Ethyl HITEC 3000 MMT Waiver Application)

Petro-Canada is one of the largest retailers of gasoline in Canada and attached is a copy of our annual report which describes our operations.

In support of Ethyl's waiver application, we at Petro-Canada wish to relate our experience concerning the use of MMT in unleaded gasoline in Canada.

In common with the other major gasoline producers, we have sold MMT containing gasoline in Canada since 1976 at up to twice the concentration applied for in the above waiver. Thus Canadian automobiles have collectively been exposed to MMT for many millions of miles and many individual vehicles to well over 100,000 miles of operation. We have not had a single complaint referencing catalyst plugging.

In addition, our research department has examined a number of catalysts from our high mileage in-house test fleet without finding evidence of catalyst plugging.

We have discussed the issue several times with the auto manufacturers and are aware of their concerns; however, they have not submitted any evidence that MMT is associated with catalyst plugging.

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In summary, Petro-Canada has found MMT to be a cost effective means of achieving the required octane levels in unleaded gasoline. We are not aware of any catalyst related problems that would preclude its use even at twice the concentration applied for in the waiver application.

Yours truly



R. E. Dart
Senior Director
Supply & Refining Department

dlc

attachment

bcc: D. C. Wilson, President (w/o a)
Ethyl Canada

W. W. Brand (w/o a)
T. Matsushita (w/o a)